

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Protein

Comment ID: 002065

Submission Date: 07/15/2010

Organization Type: Educational Institution

Organization Name: Human Nutrition, Food, & Animal Sciences, Univ of Hawaii

First Name: Alan

Last Name: Titchenal

Job Title: Associate Professor

Key Topic: Protein

Sub Topic:

Attachment: Y

Comment: Regarding the use of "ideal body weight" in stating protein recommendations, please consider deleting the word "ideal" from the following sentences.

1) In the Executive Summary (page A-6), it states, "Because protein requirements are based on ideal body weight (0.8 g protein/kg body weight/day for ages 19 years and older), lower-calorie diets result in a higher percentage of protein intake."

2) In the summary statement of the Protein chapter (page D4-30), it states, "Because the RDA of protein for any person is based on their ideal body weight (0.8 g protein/kg body weight/day for ages 19 and above), lower-calorie diets require higher percentage of protein intake."

Please see attached file for complete comments.

Comment ID: 001250

Submission Date: 06/26/2010

Organization Type: Individual/Professional

Organization Name: Abington Nutrition Services LLC

First Name: Richard

Last Name: Perlmutter

Job Title: owner

Key Topic: Carbohydrates, Fats, Protein

Sub Topic: Added sugars, Saturated fatty acids

Attachment: Y

Comment: Please see the attached letter.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Protein

Comment ID: 001278

Submission Date: 06/28/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Lloyd

Last Name: Hicks

Job Title:

Key Topic: Evidence-based Review Process, Protein

Sub Topic:

Attachment: Y

Comment: Please substantiate the following claim with findings from peer-reviewed studies.

Claim: Plant-based foods must be combined to obtain 'complete' proteins.

Recent research does not support the food-combining claim. A varied, plant-based vegan diet can meet all protein requirements (without planning). Unless you qualify the statement, the use of the phrase "high quality proteins" is objectionable. And why choose to point out that plant foods are sometimes lower in three amino acids, when you really should be citing a study that looks at a person's entire diet? Using the USDA's own data on <http://nutritiondata.com>, protein needs can be met with a vegan diet.

References to the Dietary Guidelines for Americans:

Executive Summary: "Animal sources of protein, including meat, poultry, seafood, milk, and eggs, are the highest quality proteins. Plant proteins can be combined to form complete proteins if combinations of legumes and grains are consumed. Plant-based diets are able to meet protein requirements for essential amino acids through planning and offer other potential benefits, such as sources of fiber and nutrients important in a health-promoting diet."

D-4: "Individuals who restrict their diet to plant foods may be at risk of not getting adequate amounts of certain indispensable amino acids because the concentration of lysine, sulfur amino acids, and threonine are sometimes lower in plant than in animal food proteins."

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Protein

Comment ID: 000989

Submission Date: 06/15/2010

Organization Type: Individual/Professional

Organization Name:

First Name:

Last Name:

Job Title:

Key Topic: Evidence-based Review Process, Protein

Sub Topic:

Attachment: N

Comment: Please substantiate the following claim with findings from peer reviewed studies.

Claim: Plant-based foods must be combined to obtain 'complete' proteins.

Recent research does not support the food combining claim. A varied, plant-based vegan diet can meet all protein requirements (without planning). Unless you qualify the statement, the use of the phrase "high quality proteins" is objectionable. And why choose to point out that plant foods are sometimes lower in three amino acids, when you really should be citing a study that looks at a person's entire diet? Using the USDA's own data on <http://nutritiondata.com>, protein needs can be met with a vegan diet.

References to the Dietary Guidelines for Americans:

Executive Summary: "Animal sources of protein, including meat, poultry, seafood, milk, and eggs, are the highest quality proteins. Plant proteins can be combined to form complete proteins if combinations of legumes and grains are consumed. Plant-based diets are able to meet protein requirements for essential amino acids through planning and offer other potential benefits, such as sources of fiber and nutrients important in a health-promoting diet."

D-4: "Individuals who restrict their diet to plant foods may be at risk of not getting adequate amounts of certain indispensable amino acids because the concentration of lysine, sulfur amino acids, and threonine are sometimes lower in plant than in animal food proteins."

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Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Protein

Comment ID: 001074

Submission Date: 06/22/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Denise

Last Name: Shepherd

Job Title: Debt Collector

Key Topic: Evidence-based Review Process, Protein

Sub Topic:

Attachment: N

Comment: Has anyone connected with the USDA even read The China Study? The research has already been done! A whole foods, plant-based diet is the only thing that will save this country and our healthcare system. The terrorists are not in other countries, they are Americans living right here. They are the cattle ranchers and dairy farmers. Come on USDA, stop treating the public like stupid childred. Put the facts out there. I went from vegetarian to whole foods vegan after reading The China Study and will never go back. I am not willing to die for the economy!

Comment ID: 002042

Submission Date: 07/15/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Brie

Last Name: Turner-McGrievy, PhD, MS, RD

Job Title: Postdoctoral Fellow

Key Topic: Food Groups, Minerals, Protein

Sub Topic: Iron

Attachment: N

Comment: Thanks to the Dietary Guidelines Committee for their hard work on a very detailed report. I would like to encourage the committee to refer to the American Dietetic Association's Position Paper on Vegetarian Diets (source: Craig WJ, Mangels AR. J Am Diet Assoc. 2009;109(7):1266-82), which provides an excellent scientific summary on the benefits of and issues with consuming a plant-based diet. In particular, the Committee states that "Vegans have particularly low intakes of vitamin B12, iron and calcium. It is possible to consume complementary plant proteins and have an adequate intake of protein, but education is needed on how to design adequate diets." (Part D: Section 4: Protein) Research has shown that vegetarians and vegans are no more likely to have iron deficiency anemia than non-vegetarians. (source: Ball MJ, et.al. Am J Clin Nutr. 1999;70:353-358.) In our research, we have found that people transitioning to a completely vegan diet had a greater intake of iron than those consuming an omnivorous therapeutic diet. We also found no differences in changes in zinc or calcium intake--although all participants (regardless of diet) in our study fell short of the DRI for calcium intake and women on both diets fell short on zinc intake. (sources: Turner-McGrievy GM, et. al. J Am Diet Assoc. 2008;108:1636-1645. & Turner-McGrievy GM, et. al. Nutrition. 20;9:738-46.) . Therefore, education on how to design adequate diets is important no matter the dietary pattern a person consumes. Finally, the requirement to consume complementary plant proteins is an

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Key Topic: Protein

outdated concept. Please see the ADA's position paper on vegetarian diets which states "complementary proteins do not need to be consumed at the same meal."

Comment ID: 001018

Submission Date: 06/17/2010

Organization Type: Individual/Professional

Organization Name: Howcookingworks

First Name:

Last Name:

Job Title:

Key Topic: Protein

Sub Topic:

Attachment: N

Comment: In the report, the USDA should define what 'processed meats' mean so the public can be more aware of that.

Comment ID: 001365

Submission Date: 07/06/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Eric

Last Name: P.

Job Title:

Key Topic: Protein

Sub Topic:

Attachment: N

Comment: I'm a bit confused as to why--in 2010--you are still perpetuating the myth that plant proteins need to be combined at one sitting. You're doing a major disservice to people who have been trying to debunk this myth ever since it was disproven. Relevant article: http://en.wikipedia.org/wiki/Protein_combining

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Protein

Comment ID: 001368

Submission Date: 07/06/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Russ

Last Name: Mayes

Job Title:

Key Topic: Protein

Sub Topic:

Attachment: N

Comment: I have not been able to review all of the data contained in the report. However, I do have a concern about a passage in the Executive Summary regarding proteins. The Executive Summary repeats the idea that people need to consume vegetables and grains together in order to get a "complete protein." I have read numerous articles over the last few years that indicate that the body can store amino acids and thus can produce complete proteins over the course of several meals. I think the idea of variety should be emphasized over specific combinations. People will get turned off if they think beans and rice together is the only way they can get protein in a non-calorie dense manner.

Comment ID: 001999

Submission Date: 07/15/2010

Organization Type: Industry Association

Organization Name: American Meat Institute

First Name: Betsy

Last Name: Booren

Job Title: Director, Scientific Affairs

Key Topic: Eating Patterns, Energy Balance/Physical Activity, Evidence-based Review Process, Fluid and Electrolytes, Food Groups, Food Safety, Minerals, Nutrient Density/Discretionary Calc, Other, Protein, Vitamins

Sub Topic: B Vitamins, Folate, Iron, Meat, Beans, Eggs, Fish, and Nuts, Other, Potassium, Sodium, Vitamin A and Carotenoids, Weight loss, Weight maintenance, Zinc

Attachment: Y

Comment: See attached document for AMI comments.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Protein

Comment ID: 002106

Submission Date: 07/15/2010

Organization Type: Industry Association

Organization Name: Soyfoods Association of North America

First Name: Nancy

Last Name: Chapman

Job Title: Executive Director

Key Topic: Eating Patterns, Evidence-based Review Process, Fats, Food Groups, Minerals, Nutrient Density/Discretionary Calc, Protein, Vitamins

Sub Topic:

Attachment: Y

Comment: The Soyfoods Association of North America suggests that in translating the Scientific Report from the Dietary Guidelines Advisory Committee into policy and consumer documents, that DHHS and USDA consider the following suggestions:

1. Distinguish soy products/soyfoods separately from ?cooked dry beans and peas and seeds/nuts.?
2. Recognize that soy protein is comparable to animal protein in protein quality, based on the widely recognized methodology, Protein Digestibility Corrected Amino Acid Score (PDCAAS).
3. Highlight the nutritional adequacy and high-quality protein value of soyfoods.
4. Support further research on the health benefits of plant-based diets and soyfoods in relation to heart disease, weight management and diabetes prevention.
5. Create a consumer brochure that balances simple text with menu tables, graphics and other visuals which captivates, motivates and displays to consumers how to incorporate more plant-based foods into their daily diets.

Comment ID: 002108

Submission Date: 07/15/2010

Organization Type: Industry Association

Organization Name: National Pork Producer Council

First Name: Sam

Last Name: Carney

Job Title: President

Key Topic: Eating Patterns, Evidence-based Review Process, Food Groups, Minerals, Nutrient Density/Discretionary Calc, Protein, Vitamins

Sub Topic: B Vitamins, Meat, Beans, Eggs, Fish, and Nuts, Potassium

Attachment: Y

Comment: Although it agrees with the Dietary Guidelines Advisory Committee that obesity is the No. 1 public health concern and that Americans need to eat more fruits and vegetables, the National Pork Producers Council is concerned with the committee?s recommendation that Americans consume only ?moderate? amounts of lean meat.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Protein

The problem with the American diet is not over-consumption of lean meat, which provides key nutrients not available from plant-based proteins and which studies show can aid in weight loss, it is over-consumption of empty calories ? foods filled with added sugars and solid fats that provide little nutritional value.

Lean meat is a nutrient-rich source of lean protein with unique attributes not offered by plant proteins, and extensive peer-reviewed research supports a clear role for protein in the form of lean meat as a key part of the solution to the obesity epidemic.

Comment ID: 002014

Submission Date: 07/15/2010

Organization Type: Industry Association

Organization Name: Solae LLC

First Name: Mark

Last Name: Cope

Job Title: Clinical Nutrition Scientist

Key Topic: Food Groups, Protein

Sub Topic: Other, Vegetables

Attachment: Y

Comment: Soy

Comment ID: 001997

Submission Date: 07/15/2010

Organization Type: Industry Association

Organization Name: National Turkey Federation

First Name: Hilary

Last Name: Thesmar

Job Title: Senior Director, Scientific & Regulatory Affairs

Key Topic: Protein

Sub Topic:

Attachment: Y

Comment: See attached document

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Protein

Comment ID: 002062

Submission Date: 07/15/2010

Organization Type: Nonprofit/Voluntary

Organization Name: American Cancer Society Cancer Action Network

First Name: Christopher

Last Name: Hansen

Job Title: President

Key Topic: Alcoholic Beverages, Energy Balance/Physical Activity, Nutrient Density/Discretionary Calc, Protein

Sub Topic:

Attachment: Y

Comment: The American Cancer Society Cancer Action Network is pleased to submit comments on the Dietary Guidelines Advisory Committee report.

Comment ID: 002041

Submission Date: 07/15/2010

Organization Type: Nonprofit/Voluntary

Organization Name: American Heart Association

First Name:

Last Name:

Job Title:

Key Topic: Carbohydrates, Eating Patterns, Energy Balance/Physical Activity, Fats, Fluid and Electrolytes, Nutrient Density/Discretionary Calc, Protein

Sub Topic: Added sugars, Cholesterol, Fiber, Fish oil, Omega 3 fatty acids, Oils, Unsaturated fatty acids, Saturated fatty acids, Sodium, Trans fatty acids, Whole grains

Attachment: Y

Comment: Please see attached document

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Protein

Comment ID: 001761

Submission Date: 07/13/2010

Organization Type: Nonprofit/Voluntary

Organization Name: The Vegetarian Resource Group

First Name: Reed

Last Name: Mangels, PhD, RD, LDN, FADA

Job Title: Nutrition Advisor

Key Topic: Eating Patterns, Minerals, Protein

Sub Topic: Calcium, MyPyramid

Attachment: Y

Comment: We commend the DGAC for their emphasis on plant-based diets and for the much more extensive discussion of vegetarian diets compared to previous reports. Our comments reflect some areas that we are concerned about including the emphasis on combining proteins, information on plant sources of calcium and on fracture risk with vegan diets, the need for more specific information on foods to avoid/limit, and the food group plan.

Comment ID: 002012

Submission Date: 07/15/2010

Organization Type: Nonprofit/Voluntary

Organization Name: American Institute for Cancer Research

First Name: Deirdre

Last Name: McGinley-Gieser

Job Title: Senior Vice-President for Programs

Key Topic: Evidence-based Review Process, Protein

Sub Topic:

Attachment: Y

Comment: The American Institute for Cancer Research (AICR) congratulates the DGAC for a progressive and visionary report. With one request and one reservation, we ask that it becomes the basis for the 2010 USDA DHSS Dietary Guidelines for Americans.

AICR is gratified that the DGAC has relied so thoroughly on our Expert Report, Food, Nutrition, Physical Activity and the Prevention of Cancer: A Global Perspective, published in 2007 with our sister organization the World Cancer Research Fund.

We congratulate the DGAC for its emphasis on the social, economic and environmental determinants of dietary patterns and its allowance for legislation that enables and encourages healthy living. These features are consistent with our 2009 report, Policy and Action for Cancer Prevention, which reviewed the evidence on public policies and actions most likely to achieve healthy diets and active ways of life. (Please see annex 1). Both our 2007 and 2009 reports take prevention of obesity and of other chronic diseases into account.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Protein

We stand ready to support USDA/DHSS in the final preparation of the 2010 Dietary Guidelines for Americans.

Our request is that the final food-based dietary recommendations be expressed as quantified goals. Our reservation is that the findings of our 2007 report show that red meat and also processed meat are convincing causes of colorectal cancer. Since our report was published, several large studies have been published that further support this conclusion. We will soon release our updated analysis of evidence on diet, weight, physical activity and colorectal cancer risk, which will review all of the evidence ? positive, negative and null ? on red and processed meat and colorectal cancer that has appeared since our report?s publication. In the meantime, we have summarized those points upon which we respectfully disagree with the DGAC?s review. We ask the DGAC to examine this document and revisit this discussion. (Please see annex 2).

Comment ID: 002091

Submission Date: 07/15/2010

Organization Type: Nonprofit/Voluntary

Organization Name: International Food Information Council Foundation

First Name: Marianne

Last Name: Smith Edge

Job Title: Senior Vice President, Food Safety & Nutrition

Key Topic: Fats, Protein

Sub Topic: Fish oil, Omega 3 fatty acids, Oils, Unsaturated fatty acids, Saturated fatty acids, Trans fatty acids

Attachment: Y

Comment: Please see attached comments submitted by International Food Information Council Foundation.

Comment ID: 002123

Submission Date: 07/15/2010

Organization Type: Nonprofit/Voluntary

Organization Name: New York Coalition for Healthy School Food

First Name: Amie

Last Name: Hamlin

Job Title: Executive Director

Key Topic: Food Groups, Food Safety, Protein

Sub Topic: Meat, Beans, Eggs, Fish, and Nuts, Milk

Attachment: N

Comment: Give a consistent and accurate message on the following:
On animal foods and disease
On dietary fat and obesity

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Protein

On dairy products and health
On saturated and trans fats

Include information which was omitted:
Lactose Intolerance Ignored
Damage from Animal Protein Ignored
Major Sources of Infections Ignored

Correct FACTUAL ERRORS:
Plants Are Incomplete Proteins
Plant-Based Diets Are Nutritionally Inadequate
Dairy Products and the Risk of Malnutrition
Eggs Are Safe for the General Public
Fish Is Health Food, Especially during Pregnancy

Change name of meat, eggs, nuts group to PROTEIN group

Change name of dairy group to CALCIUM group.

Comment ID: 002155

Submission Date: 07/15/2010

Organization Type: Nonprofit/Voluntary

Organization Name: The Peanut Institute

First Name: Pat

Last Name: Kearney

Job Title: Program Director

Key Topic: Protein

Sub Topic:

Attachment: Y

Comment: Peanuts contain more protein than any other nut and are one of the highest food sources of plant protein. A 1-oz package of peanuts can provide 7.41g of protein, approximately 80% more protein than the average amount of protein from tree nuts (average of 4.11g) (1).

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Protein

Comment ID: 001020

Submission Date: 06/17/2010

Organization Type: Other

Organization Name:

First Name: Shanna

Last Name: Allen

Job Title: Research Assistant

Key Topic: Food Groups, Protein

Sub Topic: Meat, Beans, Eggs, Fish, and Nuts, Milk

Attachment: N

Comment: I have reviewed your updated dietary guidelines for 2010. I do appreciate your emphasis on shifting toward a plant-based diet. I think that there is a need to stress much more the importance of drastically minimizing consumption of meat, dairy, eggs, and fish. It is no secret the impact these foods have on the environment, our health, the hungry of the world, and the lives of animals. It is irresponsible of you to allow the industry to sway your opinions about what a healthy diet consists of. The future of our species is at stake, and that is not an extreme or dramatic statement, it is the truth. Please please please promote true health in your guidelines, which undoubtedly includes a strong emphasis on a plant-based diet. You have the power to change history, change the world. Do what your hearts tell you is best. This decision should not be based on money, influence, and power. It should be based on what is true and best for the people of this world. Thank you for your consideration of my thoughts.

Comment ID: 002013

Submission Date: 07/15/2010

Organization Type: Other

Organization Name: Perdue Farms, Inc

First Name:

Last Name:

Job Title:

Key Topic: Food Safety, Protein

Sub Topic:

Attachment: Y

Comment: We appreciate the opportunity to comment on these new guidelines. Please consider the following points:

1. The importance of food safety across the food chain.
2. Poultry products considered as a high quality protein source.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Protein

Comment ID: 001873

Submission Date: 07/14/2010

Organization Type: Other

Organization Name: Soy Nutrition Institute

First Name: Mark

Last Name: Messina

Job Title: Executive Director

Key Topic: Protein

Sub Topic:

Attachment: N

Comment: The SNI would like to recognize the significant work of the DGAC in its comprehensive review of the literature. SNI requests that USDA and DHHS specifically indicate in the final Dietary Guidelines policy report and consumer materials that the quality of soy protein is comparable to the quality of animal protein and soyfoods should be grouped with animal foods as a complete, high quality protein source. The Dietary Guidelines recommendation for Americans to increase their intake of plant foods is essential to improving the health of all Americans.

Comment ID: 002105

Submission Date: 07/15/2010

Organization Type: Professional Association

Organization Name: American Dietetic Association

First Name:

Last Name:

Job Title:

Key Topic: Alcoholic Beverages, Carbohydrates, Eating Patterns, Energy Balance/Physical Activity, Evidence-based Review Process, Fats, Fluid and Electrolytes, Food Groups, Food Safety, Other, Protein, Vitamins

Sub Topic:

Attachment: Y

Comment: The American Dietetic Association is pleased to provide the attached comments on the translation of the Dietary Guidelines Advisory Committee report into the 2010 Dietary Guidelines for Americans.